

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

[2] JULIO M. HERRERA-VELUTINI,

Defendant.

CRIMINAL NO. 22-342 (SCC)

UNOPPOSED MOTION FILING REDACTED
MOTION TO COMPEL AT DOCKET NO. 438

Defendant Julio M. Herrera-Velutini (“Mr. Herrera” or “Defendant”), by and through the undersigned attorneys, respectfully moves this Court for leave to file a redacted version of its Motion to Compel, at Docket No. 438.

On December 27, 2023, Defendant filed a Motion to Compel restricted to the parties and asked the Court for permission to file a public version of the same. *See* Docket No. 437 and 438. In response, the Court requested the Government to state its position. *See* Docket No. 445. In compliance with said order, the Government responded, asking for certain information to be redacted before it be made public. *See* Docket No. 446. Counsel for Mr. Herrera and the Government exchanged a redacted version of the Motion to Compel, and the Government expressed no opposition to the filing of the same.

Therefore, Mr. Herrera respectfully requests leave to file a redacted version of the Motion to Compel attached to this Motion as Exhibit A.

Date: January 16, 2024.

DLA PIPER (PUERTO RICO) LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this same date, the undersigned attorney filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for all parties in this action.

Date: January 16, 2024

DLA PIPER (PUERTO RICO) LLP

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